

October 30, 2013

U. S. Environmental Protection Agency 1200 Pennsylvania Ave NW Washington DC 20460

## RE: FOIA Request for Certain Pasteuria spp. Historical Records

I am representing Syngenta Crop Protection, LLC in this FOIA request. Syngenta has authorized me to receive full copies of the responsive documents, all of which are expected to contain confidential business information. Syngenta's authorization letter dated October 30, 2013 is provided along with this request.

This FOIA request includes two parts - a request for registration jackets and a request for MRIDs. For the first part, please forward to me complete copies of the registration jackets for the following 14 pesticide products for which the registrations were transferred from Pasteuria Bioscience, Inc. to Syngenta on July 25, 2013:

Product Name	Old EPA Reg. No.	Current EPA Reg. No.
PASTEURIA USGAE - BL 1	85004-1	100-1511
ECONEM	85004-2	100-1512
PASTEURIA USGAE - LIQUID FORMULATION	85004-3	100-1513
NAVIVA TECH	85004-4	100-1514
NAVIVA ST	85004-5	100-1515
SOYACYST TECH	85004-6	100-1516
SOYACYST TECH+	85004-7	100-1517
NAVIVA LF	85004-8	100-1518
SOYACYST LF	85004-9	100-1519
PASTEURIA SPP. (HOPLOLAIMUS GALEATUS NEMATODE) - PH3	85004-10	100-1520
NEWPRO	85004-11	100-1521
SOYACYST WP PLUS	85004-12	100-1522
SOYACYST TECH PLUS	85004-13	100-1523
SOYACYST ST PLUS	85004-14	100-1524

For the second part of this FOIA request, please forward to me complete copies of the 20 MRIDs listed in the file "20 Pasteuria MRIDs needed by Syngenta.docx" provided along with this request. That list is a compilation obtained from the NPIRS PDMS database using the most detailed output available for each

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MRID. Summarizing those 20 MRIDs, they consist of 11 pertaining to *Pasteuria nishizawae*, 8 pertaining to *Pasteuria reniformis*, and 1 pertaining to *Pasteuria usgae*. Please note that the July 25, 2013 transfer from Pasteuria Biosciences, Inc. to Syngenta included the EPA registrations listed above as well as the data supporting those registrations, which encompasses the 20 MRIDs I am requesting. For your convenience, I have also provided a copy of the July 25, 2013 EPA transfer letter.

In view of the fact that most if not all of the responsive documents are expected to contain confidential business information now owned by Syngenta, please provide those documents to me on a CD or DVD and then arrange with me by telephone (703-339-4199) for my personal pick up of them at the OPP offices in Crystal City. A series of interim responses will be acceptable to me if some documents are fully ready for pick up before your final completion of this FOIA case.

Sincerely,
Airland Z. Comme

Richard L. Conn

President